

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III Case No. 17-BK-3283-LTS (Jointly Administered) Re: ECF Nos. 16246, 16425, & 16441
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO PUBLIC BUILDINGS AUTHORITY, Debtor.	PROMESA Title III Case No. 19-BK-5523-LTS (Jointly Administered) Re: ECF Nos. 113, 116, & 117

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF
PUBLIC BUILDINGS AUTHORITY PURSUANT TO BANKRUPTCY CODE
SECTION 105, PROMESA SECTION 315(A), AND BANKRUPTCY RULE
9019 FOR ORDER APPROVING SETTLEMENT AGREEMENT WITH
TRIPLE-S PROPIEDAD, INC. AND GRANTING RELATED RELIEF**

On March 29, 2021, the Puerto Rico Public Buildings Authority (“PBA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as

¹The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801. (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.).

PBA's sole representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"),² filed a *Motion of Public Buildings Authority Pursuant to Bankruptcy Code Section 105, PROMESA Section 315(a), and Bankruptcy Rule 9019 for Order Approving Settlement Agreement with Triple-S Propiedad, Inc. and Granting Related Relief* [Case No. 17-bk-3283, ECF No. 16246; Case No. 19-bk-5523, ECF No. 113] (the "Motion")³

On April 15, 2021, PBA filed a *Notice of Filing of Revised Proposed Order Granting Motion of Public Buildings Authority Pursuant to Bankruptcy Code Section 105, PROMESA Section 315(a), and Bankruptcy Rule 9019 for Order Approving Settlement Agreement with Triple-S Propiedad, Inc. and Granting Related Relief* [Case No. 17-bk-3283, ECF No. 16441; Case No. 19-bk-5523, ECF No. 117] (the "Revised Proposed Order").

Pursuant to this Court's *Order Granting Urgent Motion for Consensual Extension of Objection Deadline in Connection with the Motion of Public Buildings Authority Pursuant to Bankruptcy Code Section 105, PROMESA Section 315(A), and Bankruptcy Rule 9019 for Order Approving Settlement Agreement with Triple-S Propiedad, Inc., and Granting Related Relief* [Case No. 17-bk-3283, ECF No. 16425; Case No. 19-bk-5523, ECF No. 116] (the "Urgent Motion Order"), objections to the Motion by the PSA Parties (as defined in the Urgent Motion Order) were to be filed and served no later than April 15, 2021, at 4:00 p.m. (Atlantic Standard Time) (the "Objection Deadline"), and objections to the Motion by all other parties were to be filed and served no later than April 13, 2021, at 9:30 a.m. (Atlantic Standard Time). According to the *Fourteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 15894-1] (the

² PROMESA is codified at 48 U.S.C. §§ 2101–2241.

³ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

“Case Management Procedures”), the Court may enter an order granting the relief requested without a hearing upon receipt of a certificate of no objection (“CNO”, as defined in the Case Management Procedures). *See* Case Management Procedures, Section III, paragraph P.

In accordance with the Case Management Procedures, the undersigned hereby states that he is filing this CNO not less than forty-eight (48) hours after the expiration of the Objection Deadline. The undersigned further certifies that he has reviewed the Court’s docket in this case not less than forty-eight (48) hours after the Objection Deadline and that no applicable objection, responsive pleading, or request for a hearing with respect to the Motion appears on the docket.

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WHEREFORE PBA respectfully requests that the Court enter the proposed order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: April 21, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock (admitted *pro hac vice*)
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Exhibit A

Proposed Order